TENNESSEE REGULATORY AUTHORITY

Sara Kyle, Chairman Lynn Greer, Director Melvin Malone, Director



460 James Robertson Parkway Nashville, Tennessee 37243-0505

October 12, 2001

Mr. Charles Howorth Regulatory Vice President BellSouth Telecommunications, Inc. 333 Commerce Street Nashville, TN 37201-3300

Dear Mr. Howorth:

To assist the Authority in its evaluation of Docket 01-00808, Complaint of Access Integrated Network, Inc. Against BellSouth Telecommunications, Inc., and Docket 01-00868, Complaint of XO Tennessee, Inc. Against BellSouth Telecommunications, Inc., it is requested that you respond to the questions posed below.

- 1. For the customer referenced in the XO Complaint (Docket 01-00868), did the customer receive three free months of service per the representation in the email? Has the customer signed any contractual documents related to the offer of three free months of service? If so, please provide copies of all such documents.
- 2. Identify all managerial employees who authorized the sales representatives in both of the above referenced complaints to offer three free months of service.
- 3. Identify all customers who have accepted an offer of free local service and have or will be provided free telephone services. Also, indicate whether, at the time the offer was made, the customer was receiving service from BellSouth.
- 4. What internal controls exist within BellSouth to ensure compliance with tariff provisions by BellSouth account representatives and outside agents marketing BellSouth's regulated services?
- 5. Has BellSouth modified any of its billing systems used to bill customers in Tennessee to allow free service to be offered to customers? If no, did the capability already exist in any of the billing systems used by BellSouth to bill customers in Tennessee?

- 6. Provide a list of all customers in Tennessee, including customer contact and telephone number, which BellSouth representatives have enrolled in the Key Business Discount program with since its inception in Tennessee. Indicate if any of these customers have received or will receive free local service at any time they are enrolled in the Key Business Discount Program.
- 7. Provide all documents, including but not limited to, email, training materials, and internal correspondence, discussing free local telephone service offers to customers in Tennessee.

It is requested that this information be furnished by Friday, October 19, 2001. If you have any questions regarding this matter, please contact Jerry Kettles at (615) 741-2791, extension 153.

Sincerely,

David Waddell, Executive Secretary